

From: Sirak, Reed
To: Schultz, Natalie; W Michael Oberfield
Cc: Kuss, Hala; Russell, Tess; Demma, Carlo
Subject: RE: US EPA - Renergy Meeting 3/8
Date: Wednesday, March 16, 2022 3:41:54 PM
Attachments: image001.png
mia_mt-bc_en.pdf
Importance: High

Hi Natalie,

As you know, Renergy's response to EPA's supplemental request below is due today. Renergy responded to EPA's requests below in red and attached.

Thank you,

Reed

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From: Schultz, Natalie <Schulz.Natalie@epa.gov>
Sent: Wednesday, March 9, 2022 3:38 PM
To: Sirak, Reed <RSirak@beneschlaw.com>; W Michael Oberfield <wmoberfield@renergy.com>
Cc: Kuss, Hala <Kuss.Hala@epa.gov>; Russell, Tess <Russell.Tess@epa.gov>; Demma, Carlo <Demma.Carlo@epa.gov>
Subject: US EPA - Renergy Meeting 3/8

Hello,

Exemption 7(a)
[Redacted]

Please provide the following, as discussed in our meeting:

1. Provide the owner's manual for the permanent monitor at the Emerald facility. *See Gas Monitoring (permanent) Owner's Manual attached as "mia_mt-bc_en.pdf"*
2. Provide start and end dates for engine and digester downtime, maintenance, rebuilds, reseed, etc. at the Emerald and Dovetail facilities. *Provide start and end dates for when all biogas was directed to the flare only at the Emerald and Dovetail facilities. Provide answers in a clear, timeline format, starting in March 2017.*
3. Provide start and stop date(s) of receiving materials at the Emerald and Dovetail facilities, beginning in March 2017.

Renergy responds to requests 2 and 3 together as follows:

Emerald: The engine went down on 6/21/2020 and is not operational at this time; it is awaiting installation after the rebuild.

The flare did not operate starting 6/21/2020. The flare restarted on 12/7/2021.

Emerald digester went down on 6/21/2020.

1st re-seed started on 9/17/20.

1st re-seed "stopped" on 5/5/21.

2nd re-seed started on 9/9/21.

The Emerald digester started producing gas on 10/14/21.

The Emerald digester did not receive material from 7/18/21 - 10/21/21.

Dovetail: The engine went down on 6/25/2020 and was restarted 12/4/2021.

Flare did not operate starting 6/29/2020. The flare restarted on 10/6/2021.

Biology in Dovetail digester started failing on 6/30/2020.

1st re-seed started on 5/21/21.

1st re-seed "stopped" on 7/7/21.

2nd re-seed started 9/13/21.

The Dovetail digester started producing gas on 10/4/21.

Dovetail did not stop receiving material. Renergy cut back significantly on feedstock but never stopped entirely for any extended period. The reseed remains an ongoing process.

Operations were continuous from March 2017 to June 2020 at Emerald and from March 2017 to June 2020 at Dovetail.

4. Account for the following gaps in hydrogen sulfide data: Emerald facility 6/29/2020 – 12/14/2020 and Dovetail facility 6/29/2020 – 10/04/2021. *There was no hydrogen sulfide generated during those periods according to our data.*
5. Provide an explanation for the hydrogen sulfide level entries at the bottom of the spreadsheet titled "6 & 7 Hydrogen Sulfide Testing Log -WMO", specifically the entries starting at 5/9/22 for the Emerald facility and 10/18/2022 for the Dovetail facility. *The data was included in error due to the copy and paste function extending the spreadsheet out for future reporting. The values should have been blank for the dates shared. Renergy's operations team has corrected the spreadsheet internally.*
6. Describe the origin and significance of the values "0.023 millions of cubic feet of biogas for the Engine" and "0.027 millions of cubic feet of biogas for the Flare" used in the volume MMSCF Usage calculation from the spreadsheets ("22 Emerald MMSCF" and "22 Dovetail MMSCF") submitted in response to item #22 of the initial 114 request. *Renergy has utilized the following to the best of its knowledge:*

Heat Content of Methane	1010	BTU/scf
Millions of cubic feet of biogas for Engine	0.023	
Millions of cubic feet of biogas for Flare	0.027	

Renergy does not know the origin of this information but it believes that it would have been provided to Renergy by the engineers during machinery and equipment installation at the time of construction.

7. Confirm and/or provide the following information: a. The capacity of the flares at the Emerald and Dovetail facilities is 440 scfm. *Confirmed;* b. Along with visual checks, Renergy is using AP-42 Chapter 13, Tables 15.1-15.2 emission factors to ensure flare capacity is not being breached. If this is the case, provide an example of these calculations. *Confirmed that visual checks are performed. Renergy cannot confirm at this time whether it is using the AP-42 Chapter 13, Tables 15.1-15.2 emission factors.* c. Renergy is currently scheduling a stack test company to visit Emerald and Dovetail to determine, for each facility, the flare's exit velocities and maximum velocity. *Confirmed, Renergy will determine the flare's exit velocities and the maximum velocity during the next stack test;* d. Explain how Renergy calculates the Net Heating Value according to 40 C.F.R. § 60.18. *Renergy uses the following formula to calculate the Net Heating Value: "%methane*Hcm 110 btu/scf". For example, at Emerald "55%*110=555.5 heat content"*

8 Confirm the diameter of the flare tip at the Dovetail and Emerald facilities 43 5"

Please provide a response by Friday March 11, 2022

Sincerely,

Natalie Schulz

Environmental Engineer

Air Enforcement and Compliance Assurance Branch

U S EPA, Region 5

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